

**EXHIBIT E**

STIM & WARMUTH, P.C.  
2 Eighth Street  
Farmingville, NY 11738  
Telephone: 631-732-2000  
Facsimile: 631-732-2662  
Paula J. Warmuth  
Glenn P. Warmuth

Attorneys for Defendant

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
SECURITIES INVESTOR PROTECTION  
CORPORATION,

Adv. Proc. No.  
08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively  
Consolidated)

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

-----X  
In Re:

BERNARD L. MADOFF,

Debtor.

-----X  
IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff  
Investment Securities LLC,

Adv. Proc. No.  
10-04941 (SMB)

Plaintiff,

v.

MICHAEL MOST,

Defendant.

-----X  
most-134

**DEFENDANT'S RESPONSE TO REQUESTS FOR ADMISSION**

The defendant, Michael Most, for his response to the requests for admission dated July 10, 2012 served by the plaintiff, states as follows:

Request No. 1. Admit that You received each of the Two year Transfer(s) set forth on Exhibit B to the Complaint, on each of the corresponding dates set forth on Exhibit B to the complaint, for BLMIS account number 1ZA781.

Response: Denies except admits that Michael Most received funds from his BLMIS brokerage account between December 11, 2006 and December 11, 2008 on or about the dates and in the amounts set forth in Exhibit B to the amended complaint.

Request No. 2. As to each of the Two Year Transfer(s), admit that You were the initial transferee, within the meaning of 11 U.S.C. § 550(a).

Response: Denies except admits that Michael Most withdrew funds from his brokerage account with BLMIS between December 11, 2006 and December 11, 2008 on or about the dates and in the amounts set forth in Exhibit B to the amended complaint.

Request No. 3. As to each of the Two Year Transfer(s), admit that You were the immediate or mediate transferee of an initial transferee, within the meaning of 11 U.S.C. § 550(a).

Response: Denies except admits that Michael Most withdrew funds from his brokerage account with BLMIS between December 11, 2006 and December 11, 2008 on or about the dates and in the amounts set forth in Exhibit B to the amended complaint.

Request No. 4. Admit that You have not returned any of the Two Year Transfer(s) to the Trustee.

Response: Denies except admits that Michael Most has not returned any funds to the Trustee that Michael Most withdrew from his brokerage account with BLMIS between December 11, 2006 and December 11, 2008.

Request No. 5. Admit that You received each of the Six Year Transfer(s) set forth on Exhibit B to the Complaint, on each of the corresponding dates set forth on Exhibit B to the Complaint, for BLMIS account number 1ZA781.

Response: Object as not relevant - 6 year claims dismissed.

Request No. 6. As to each of the Six Year Transfer(s), admit that You were the initial transferee within the meaning of 11 U.S.C. § 550(a).

Response: Object as not relevant - 6 year claims dismissed.

Request No. 7. As to each of the Six Year Transfer(s),  
admit that You were the immediate or mediate transferee of an  
initial transferee, within the meaning of 11 U.S.C. § 550(a).

Response: Object as not relevant - 6 year claims  
dismissed.

Request No. 8. Admit that You have not returned any of  
the Six Year Transfer(s) to the Trustee.

Response: Object as not relevant - 6 year claims  
dismissed.

Dated: Farmingville, NY  
January 29, 1014

STIM & WARMUTH, P.C.

By: 

PAULA J. WARMUTH

Attorney for Defendant,

Michael Most

2 Eighth Street

Farmingville, NY 11738

Telephone: 631-732-2000

Facsimile: 631-732-2662

Paula J. Warmuth

Email: [pjw@stim-warmuth.com](mailto:pjw@stim-warmuth.com)

Glenn P. Warmuth

Email: [gpw@stim-warmuth.com](mailto:gpw@stim-warmuth.com)

TO:

BAKER & HOSTETLER LLP  
Attorneys for Plaintiff  
David J. Sheehan, Esq.  
email: dsheehan@bakerlaw.com  
Marc E. Hirschfield, Esq.  
email: mhirschfield@bakerlaw.com  
Michael R. Matthias, Esq.  
email: mmathias@bakerlaw.com  
Karen Law, Esq.  
email: klaw@bakerlaw.com

## VERIFICATION

STATE OF FLORIDA       )  
                                  ) SS:  
COUNTY OF PALM BEACH)

MICHAEL MOST, being duly sworn, deposes and says:

1. I am the defendant in this action.
2. I have read the foregoing responses to requests for admission and know the contents and the same are true to my own knowledge, except as to matters herein stated to be alleged upon information and belief, and as to those matters I believe it to be true.

Sworn to before me this

29 day of January, 2014

  
NOTARY PUBLIC

  
MICHAEL MOST



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CERTIFICATE OF SERVICE

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PAULA J. WARMUTH does hereby affirm under the penalties of perjury:

I am not a party to this action. I am over the age of 21 years. I reside at 2 Eighth Street, Farmingville, New York. I am duly admitted to practice law in the State of New York and in the Southern District of New York. On January 31, 2014, I served the annexed defendant's response to request for admissions on:

Baker Hostetler LLP  
c/o Michael R. Matthias  
12100 Wilshire Boulevard  
15<sup>th</sup> Floor  
Los Angeles, CA 90025-7120

which address was designated by said attorney(s) or person(s), by depositing it enclosed in a postpaid properly addressed wrapper by first class mail [if excess of weight limit for first class mail, by priority mail] in the post office or official depository at Farmingville, New York State under the exclusive care and custody of the United States Postal Service.

Dated: Farmingville, NY  
January 31, 2014

STIM & WARMUTH, P.C.

By: 

PAULA J. WARMUTH  
Attorney for Defendant,  
Michael Most  
2 Eighth Street  
Farmingville, NY 11738

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Paula J. Warmuth  
Email: [pjw@stim-warmuth.com](mailto:pjw@stim-warmuth.com)  
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DEFENDANT'S RESPONSE TO REQUEST FOR  
ADMISSIONS

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**STIM & WARMUTH, P.C.**

Attorneys for Defendant, Michael Most  
Office and Post Office Address  
2 Eighth Street

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Phone: (631) 732-2000 Fax: (631) 732-2662

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